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15 *the Nationwide and California Classes*

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34 *Attorneys for Defendant*  
35 *Fashion Nova, Inc.*

36 **UNITED STATES DISTRICT COURT**  
37 **NORTHERN DISTRICT OF CALIFORNIA**

38 JUAN ALCAZAR, individually and  
39 on behalf of all others similarly  
40 situated,

41 Plaintiffs,

42 vs.

43 FASHION NOVA, INC., a California  
44 corporation; and DOES 1 to 10,  
45 inclusive,

46 Defendants.

47 Case No.: 4:20-cv-01434-JST

48 **JOINT STIPULATION AND**  
49 ~~PROPOSED~~ **ORDER EXTENDING**  
50 **DEADLINES IN THE ORDER**  
51 **GRANTING PRELIMINARY**  
52 **APPROVAL OF PROPOSED**  
53 **AMENDED SETTLEMENT**  
54 **[ECF No. 203]**

1 Plaintiff Juan Alcazar (“Plaintiff”) and Defendant Fashion Nova, Inc.  
 2 (“Defendant”) (collectively, the “Parties”), by and through their respective counsel  
 3 of record, jointly stipulate to and request the entry of an order for a short 30-day  
 4 extension of the deadlines set in the Order Granting Plaintiff’s Motion for  
 5 Preliminary Approval of Proposed Amended Settlement (“Order”) [ECF No. 203].

6 *Whereas*, the Court entered the Order on May 14, 2025, and set the following  
 7 deadlines:

Event	Deadline
Class Action Fairness Notice	May 23, 2025
Deadline to commence mailing notice to organizations for the visually impaired and implementation of digital notice program	May 21, 2025
Deadline to commence posting notice of the proposed settlement on the Settlement Website	May 21, 2025
Motion for attorney’s fees, costs, and incentive awards due	July 22, 2025
Deadline to object to settlement, attorney’s fees request, or incentive awards	September 19, 2025
Deadline for California Class Members to file a claim	September 19, 2025
Motion for final approval (including responses to objections) due	October 23, 2025
Final Approval Hearing	January 8, 2026

22  
 23 *Whereas*, Plaintiff promptly sent the order to the settlement administrator on  
 24 the same day it was entered (May 14, 2025);

25 *Whereas*, the Order’s deadline for the settlement administrator to commence  
 26 mailing and posting notices is May 21, 2025;

1        *Whereas*, the settlement administrator reported to the Parties that it could not  
 2 assemble and distribute the notices by the May 21, 2025 deadline and require at  
 3 least 30 days after receiving the Court's Order to execute the tasks necessary;

4        *Whereas*, the parties met and conferred to extend all deadlines by 30 days to  
 5 accommodate the settlement administrator to execute the necessary tasks.

6

7        **IT IS HEREBY STIPULATED** that the Parties jointly request the entry of  
 8 an order extending the deadlines set in the Order Granting Plaintiff's Motion for  
 9 Preliminary Approval of Proposed Amended Settlement [ECF No. 203] as follows:

Event	Deadline
Class Action Fairness Notice	June 23, 2025
Deadline to commence mailing notice to organizations for the visually impaired and implementation of digital notice program	June 20, 2025
Deadline to commence posting notice of the proposed settlement on the Settlement Website	June 20, 2025
Motion for attorney's fees, costs, and incentive awards due	August 21, 2025
Deadline to object to settlement, attorney's fees request, or incentive awards	October 20, 2025
Deadline for California Class Members to file a claim	October 20, 2025
Motion for final approval (including responses to objections) due	December 12, 2025
Final Approval Hearing	Thursday, February 12, 2026 @ 2:00 p.m. or at the Court's Convenience

1 **IT IS SO STIPULATED.**

2

3 Dated: May 16, 2025

Respectfully submitted,

4 By: /s/ Thiago M. Coelho

5 Thiago M. Coelho  
6 Jennifer Leinbach  
7 **WILSHIRE LAW FIRM, PLC**  
8 *Attorneys for Plaintiff Juan Alcazar  
and the Nationwide and California  
Classes*

9 Dated: May 16, 2025

Respectfully submitted,

10 By: /s/ Amy P. Lally

11 Amy P. Lally  
12 Eric B. Schwartz  
13 Anna Tutundjian  
14 Marissa X. Hernandez  
15 **SIDLEY AUSTIN LLP**  
16 *Attorneys for Defendant  
17 Fashion Nova, Inc.*

1 **ATTESTATION OF CONCURRENCE OF FILING**

2 In accord with the Northern District of California's Local Rule 5-1(i)(3), I  
3 attest that concurrence in the filing of this document has been obtained from each  
4 of the other signatories who are listed on the signature page(s).

5 */s/ Thiago M. Coelho*  
6 Thiago M. Coelho  
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**PROPOSED ORDER**

Having reviewed the parties' stipulation and good cause appearing therefore, it is hereby ordered that the deadlines set in the Order Granting Plaintiff's Motion for Preliminary Approval of Proposed Amended Settlement [ECF No. 203] are extended and modified as follows:

Event	Deadline
Class Action Fairness Notice	June 23, 2025
Deadline to commence mailing notice to organizations for the visually impaired and implementation of digital notice program	June 20, 2025
Deadline to commence posting notice of the proposed settlement on the Settlement Website	June 20, 2025
Motion for attorney's fees, costs, and incentive awards due	August 21, 2025
Deadline to object to settlement, attorney's fees request, or incentive awards	October 20, 2025
Deadline for California Class Members to file a claim	October 20, 2025
Motion for final approval (including responses to objections) due	December 12, 2025
Final Approval Hearing	Thursday, February 12, 2026 @ 2:00 p.m. or _____

**IT IS SO ORDERED.**

Date: May 21, 2025

  
 Hon. Jon S. Tigar  
 United States District Court Judge